

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

GRANVILLE RITCHIE
Petitioner,

v.

STATE OF FLORIDA
Respondent.

**PETITIONER'S APPLICATION FOR EXTENSION OF TIME
TO FILE PETITION FOR A WRIT OF CERTIORARI**

CAPITAL CASE

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Public Defender

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**PETITIONER'S APPLICATION FOR EXTENSION OF TIME
TO FILE A PETITION FOR A WRIT OF CERTIORARI**

*To the Honorable Clarence Thomas, Associate Justice of the Supreme Court of the
United States and Circuit Justice for the Eleventh Circuit:*

Petitioner, Granville Ritchie, respectfully applies to this Court for an order extending the time in which to file his petition for writ of certiorari from November 21, 2022 up to and including January 20, 2023, a period of sixty (60) days. This Court has jurisdiction under 28 U.S.C. §1257(a). In support of this Application, Mr. Ritchie states as follows:

1. Mr. Ritchie is incarcerated under conviction of murder for which he was sentenced to death. On June 9, 2022, the Florida Supreme Court issued an opinion in Case No. SC20-1422 (attached as Exhibit A), wherein the Court affirmed the death sentence. Mr. Ritchie's motion for rehearing was denied on August 23, 2022 (attached as Exhibit B).
2. Ritchie's issues implicate the Fifth, Sixth, Eighth, and Fourteenth Amendments and raise important questions regarding the Constitution's prohibition against penalizing an individual for the exercise of constitutional rights, the right to a fair and impartial jury, and the heightened need for reliability in imposing death sentences.
3. Mr. Ritchie now seeks a writ of certiorari for the Florida Supreme Court with respect to its decision in this case. This Court's jurisdiction to grant the same arises pursuant to 28 U.S.C. § 1254 (1).

4. According to Supreme Court Rule 13.3, the petition for writ of certiorari is due on or before November 21, 2022. See Supreme Court Rule 13.3 (“the time to file the petition for a writ of certiorari . . . runs from the date of the denial of rehearing or, if rehearing is granted, the subsequent entry of judgment”). However, the time granted by Supreme Court Rule 13 will be insufficient to allow Petitioner’s counsel to do justice to the issues at hand, which are of vast import. Therefore, Petitioner seeks an extension of sixty (60) days in which to file his petition for a writ of certiorari. See Supreme Court Rule 13.5 (“[A] Justice may extend the time to file a petition for writ of certiorari for a period not exceeding 60 days”).
5. In accordance with Supreme Court Rule 13.5, this Application is submitted at least ten (10) days prior to the present due date. Further, the requested extension is made in good faith and not for the purposes of delay. The requested extension is made because of the vital importance associated with the issues at hand – the right to a fair and reliable sentence. This Court has repeatedly emphasized that “our duty to search for constitutional error with painstaking care is never more exacting than it is in a capital case.” *Burger v. Kemp*, 483 U.S. 776, 785 (1987). Thus, it is important that counsel be granted additional time to prepare Mr. Ritchie’s petition with the care demanded of such cases.

6. Other obligations, including on behalf of clients who are facing capital punishment, have precluded counsel from being able to direct adequate time and attention to the preparation of a petition for writ of certiorari on Petitioner's behalf. Therefore, in light of counsel's current obligations and the importance of the constitutional issues that will be presented in this capital case, counsel submits that a sixty (60) day extension is necessary and appropriate in order to effectively prepare the petition for certiorari on Mr. Ritchie's behalf.

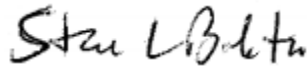
Wherefore, in the interest of justice and for good cause shown, counsel for Mr. Ritchie respectfully request that this Court extend the current November 21, 2022, deadline up to and including January 20, 2023.

Dated: November 2, 2022

Respectfully submitted,



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